



BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

October 31, 2001

Guy M. Hicks
General Counsel

615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Docket to Determine the Compliance of BellSouth
Telecommunications, Inc.'s Operations Support Systems with
State and Federal Regulations*
Docket No. 01-00362

Dear Mr. Waddell:

Enclosed please find the discovery responses of PricewaterhouseCoopers ("PwC"). Documents responsive to requests 2, 3 and 4 were submitted to the Authority on October 12, 2001 subject to the terms of the Protective Order. Also enclosed are the responses to interrogatories PwC filed with the North Carolina Public Utilities Commission on August 8, 2001. Because PwC does not have local counsel in Tennessee and does not appear before the Authority, BellSouth is filing these responses on behalf of PwC as a courtesy to PwC and to AT&T.

Copies are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

cc: Robert Lattimore
Steven Witzel, General Counsel
PricewaterhouseCoopers

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 1 Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the interrogatory with which that person assisted.

REPLY: This is the list of person who provided information:

- Robert L. Lattimore Partner PwC for interrogatories N° 9, 11, 12 and 13.
- Mike Lawley Manager PwC for interrogatory N° 5
- Martino Stefanoni Manager PwC for interrogatories N° 1, 2 and 4.
- Ronald Taylor Manager PwC for interrogatories N° 6, 7, 8, and 9.
- Wayne Cave Manager PwC (Quality Operation Group) N° 3

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 2 Describe PwC's policy regarding employee retention of electronic mail

REPLY:

The Assurance and Business Advisory Services (ABAS) LoS performed the BellSouth engagement. The ABAS policy regarding employee retention of electronic mail is the following: "In reference to E-mails and general correspondence of any type, if the communication is necessary to support PwC work, it should be included in the engagement files, either electronically or in paper form. If it's not necessary to support PwC work, it should not be retained. Desk file or rough file material should be discarded at the end of the engagement.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 3 Describe PwC's capability to use computer back up system (e.g. tapes, drives, etc.) to retrieve electronic mail that has been deleted by any employee.

REPLY: PwC Partners and Staff who may have deleted electronic mail from their email account, either accidentally or otherwise, may possibly attempt to retrieve the deleted e-mails through the PwC Global Technology Solutions Center. Depending on the local server capabilities and other variables, deleted e-mails may not be retrievable; if there is retrievable capacity, it is typically for a limited period of approximately seven (7) days.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 4 Describe BellSouth's answers to each technical questions that PwC submitted to BellSouth pursuant to page 5 of BellSouth's Request for Proposal N° RFP-01-R-0017.

REPLY: PwC addressed some questions during the conference call on March 14, 2001.

The following are the relevant questions and answers:

1. (PwC) Will BSC define performance standards for the DOE vs. SONGS assertion that these systems have no material performance differences?

(BSC) Yes, we will define the standards and will incorporate them into our assertion. We do not currently have this definition available to provide to you. It is likely that this definition will not be provided until the confirmation of the assertion is underway.

2. (PwC) What date will BSC assert that it's systems are regional?

(BSC) The assertion date will be 3/23/01. A letter will be provided to the selected vendor when the engagement begins to make this assertion.

3. (PwC) Will any other interfaces be included in the regionality validation?

(BSC) The scope of this engagement will include the OSS components for pre-ordering and ordering (TAG, RoboTAG, EDI, LENS, LSRR, LEO, LESOG, LNP Gateway, LAUTO, SOCS, DOE and SONGS). We will not incorporate any other systems or interfaces into this proposal.

4. (PwC) One other issue that was asked by PwC discussed was instances vs. versions.

(BSC) A unvalidated snapshot of these OSS components as they relate to this issue were provided.

S = Single and M = Multiple

	Instances	Versions
TAG	M	M
RoboTAG	M	M
EDI	M	M
LENS	M	M
LSRR	M	S
LEO	M	S
LESOG	M	S
LNP Gateway		S
LAUTO		S
SOCS	M	S
DOE	M	S
SONGS	M	S

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore
Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY #5 Identify each PwC employee that participated in the review of BellSouth's OSS, describe the scope of their responsibilities in conducting that review, and describe their professional qualifications.

REPLY:

Name	Responsibility	Professional Qualifications
Robert Lattimore	Engagement Partner	Robert is a Global Risk Management Solutions (GRMS) partner in PwC's Telecommunications Industry Practice, and is the lead partner with respect to these services at BellSouth. He is a CPA with over 16 years of experience performing audits of financial statements and attestations in a variety of industries and is currently responsible for information technology assurance services to telecommunications clients.
Russell Sapienza	Advising Partner	Russ is a GRMS Partner in PwC's Telecommunications Industry Practice, specializing in audits and reviews of complex systems and processes. Directed hundreds of thousands of hours of audit and attestation engagements, which result in third party reports to management, boards of directors and regulatory bodies.
Joe Atkinson	Advising Senior Manager	Joe was a Senior Manager in our GRMS Telecommunications Group, and has been with PwC for nearly 8 years. Joe has significant experience in providing telecommunications consulting and audit services to our clients.
Larry Keller	Managing Director – Regulatory/Process Advisor	Larry has been with PricewaterhouseCoopers for six years and has over 28 years of industry experience, including as an economist with the FCC, and as a telecommunications attorney. He has led engagements for several major telecommunications providers, including assisting Bell Atlantic in designing, developing, implementing and testing OSS for wholesale service pre-ordering, ordering, provisioning, billing, and repair and maintenance functions.

Jeffrey Ash	Lead Engagement Manager	Jeff Ash is a Manager in our Telecommunications Industry Practice and has significant consulting and attestation experience in the communications industry. He is a CPA and Certified Information Systems Auditor (CISA) and was responsible for the daily conduct and progress of the engagement and working with the partners and coordinating professional services provided to BellSouth for the OSS Regionality Review.
Michael Lawley	OSS Regionality System Comparability Manager DOE and SONGS Review Manager	Michael Lawley is a Manager and a CPA in our Telecommunications Industry Practice and has significant international consulting and attestation experience in the communications industry. Mike has extensive cross-functional experience, having led engagements covering network operations, call collection and billing systems, financial support systems, revenue assurance, reseller billing, interconnection and dispute management.
Ron Taylor	OSS Regionality Attestation - Process Comparability Manager	Ron has 12 years of domestic and international telecommunications experience. Served as the Senior Manager of Financial Operations for a major IXC. He has lead and participated in multiple attestation and consulting engagements including regulatory compliance, revenue assurance, business process improvement, credit and collection analysis and system implementation, interconnection and dispute management, new product development and risk management assessment.
Joseph Annoni	OSS Regionality Attestation - Process Comparability Manager	Joe has an MBA and over 10 years of telecommunications experience. Led numerous cross functional consulting engagements including process mapping & design in ordering, provisioning, and billing functions.
Martino Stefanoni	OSS Regionality Attestation – Complex Process Comparability Senior DOE and SONGS - Field work Manager	Martino is an Italian Certified Public Accountant and Italian Chartered Auditor. Over 5 years of international experience in independent assessments of the adequacy of process controls and systems for major corporations. He has undertaken independent assessments of the compliance of the major carrier to the requirements of the regulatory bodies. Martino have as well carried out telecommunications consulting engagement including network operations, message processing and billing systems, error correction processes and controls, financial support systems and revenue assurance.
April Lawrence	OSS Regionality Attestation – Change Control Senior	April has 3 years of public accounting, system audit experience in telecommunications. She has completed numerous review of change control procedures.
AJ McGunigal	OSS Regionality Attestation - Systems Comparability Team DOE and SONGS – Transaction Recording	A consultant with PricewaterhouseCoopers LLP in Management Consulting Services for past 4 years. AJ has participated in multiple full-lifecycle software implementations as well as billing reconciliation for a cable subscription

	Transaction Recording	client.
Giovanni Blasi	OSS Regionality Attestation (DOE and SONGS) - Senior Associate	Certified Public Accountant in Italy. Over 5 years of international telecommunications experience. He has worked on several financial audits of telecommunications companies and consulting engagements including billing systems, financial support systems and revenue assurance.
Vikram Das	DOE and SONGS - Transaction Recording	Chartered Accountant registered with the Indian Institute of Chartered Accountants, Over 5 years of public accounting experience, telecommunications experience with the cellular industry in the US.
Joanna Ganiear	OSS Regionality Attestation (DOE and SONGS) - Associate	Associate consultant with PricewaterhouseCooper's Operational and Systems Risk Management (OSRM) practice with two years of computer assurance and telecommunications consulting experience. Joanna has performed various controls related reviews in regard to order activation/provisioning process along with identifying weaknesses and opportunities.
Lisa Whitaker	DOE and SONGS - Transaction Recording	BBA in Accounting from Georgia State University. 2.5 Years of auditing and controls testing experience with PricewaterhouseCoopers. One year of telecommunications industry experience.
Meera Puri	OSS Regionality Attestation - Process Comparability Associate	PricewaterhouseCoopers experience includes financial audit and IT systems risk management. Also, Meera has experience assisting corporations develop comprehensive privacy compliance frameworks by focusing on privacy risk assessments and assurance, privacy policy development, and online privacy issues.
Jack Heyman	OSS Regionality Attestation - Systems Comparability	Certified Public Accountant in Florida. Four years of financial audit experience. Two years of internal controls testing and have performed a vast amount of applications controls reviews.
Amy Boohaker	DOE and SONGS - Transaction Recording	Amy is an Assurance and Business Advisory Service associate with over a year of experience at PricewaterhouseCoopers.
Takesha Magby	DOE and SONGS - Transaction Recording	Certified Public Accountant in Alabama. Takesha has performed several internal audit engagements which addressed quality control assurance.
Craig Atkinson	DOE and SONGS - Transaction Recording	PricewaterhouseCoopers Experienced Associate focusing on Technology, Information and Communication industry. Craig has worked on various telecommunications clients including process reviews and general control reviews of financial support systems and IT environments.
Troy Pritchett	DOE and SONGS - Transaction Recording	Experienced Associate focusing on Technology, Information and Communication industry. Troy has two years of auditing experience at PricewaterhouseCoopers.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 6 Identify each BellSouth representative with whom PwC communicated regarding Issue Reference Nos. B.3, B.4, and B.5 identified in PwC's Pre-Ordering Regionality Testing Issue Tracking matrix.

REPLY: Jim Hope, Resale Ops Director
Pam Gholsten, Work Load Manager
Kathy Wilson-Chu, Director
Steve Ferguson, Director
Maria Boykin, Contract Project Manager
Lisa Foshee, Attorney
Pat Ward, Ops Manager
Beth Craig, Ops Director
William Aguilla, Training Manager
Dee Freeman Butler, General Manager
Diane Myers, Ops Manager
Elaine Hunt, Ops Manager
Michelle McRae, Subject Matter Expert
Shelley Miller
Laura Kelley

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 7 Describe the process by which PwC resolved Issue Reference Nos. B.3, B.4, and B.5 identified in PwC's Pre-Order/Order Regionality Testing Issue Tracking matrix

REPLY: PwC communicated to the BellSouth management team that the above issues (independently) were identified and were inconsistent with the written procedures and documentation supplied for LCSC order handling. BellSouth contacted each LCSC and advised that the above issues were identified and that the source of the inconsistency should be identified and corrected. Further, the BellSouth management team created paper fliers that were posted in each bay of representatives in all three locations (Birmingham, Atlanta and Jacksonville) that advised the representatives that all orders, regardless of receipt method, must be processed First In-First Out. Additionally, each Operations Manager communicated to their work group during pre-shift meetings of the issue(s) and the proper handling procedures of these order types.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 8 Identify each of the BellSouth representatives that PwC worked with to resolve Issue Reference Nos. B.3, B.4, and B.5 identified in PwC's Pre-Ordering/Order Regionality Testing Issue Tracking matrix, and the role that each representative played in resolving these issues.

REPLY: **Kathy Wilson-Chu**, Director (covering for Milton McElroy who was out of country), **Steve Ferguson**, Director, **Maria Boykin**, Project Manager and **Lisa Foshee**, Attorney were present during the original communication from PwC to the BellSouth management team. During this meeting, a corrective plan was arrived at which began with providing instructions to **Dee Freeman-Butler** about first-in, first out and need to recommunicate this policy to each representative within the LCSC.

Jim Hope, Resale Ops Director – After the distribution of fliers in each of the bays and the pre-shift training, Jim was re-interviewed by PwC to confirm the actions taken to correct the noted inconsistencies.

Pam Gholsten, Work Load Manager – After the distribution of fliers in each of the bays and the pre-shift training, Pam was re-interviewed by PwC to confirm the actions taken to correct the noted inconsistencies.

Pat Ward, Ops Manager – Pat conducted pre-shift training sessions with her team to advise of the corrected handling procedures. She also participated in random interviews conducted by PwC of representatives where the procedures

were verbally confirmed.

Beth Craig, Ops Director – Arranged and accompanied PwC back to each of the centers during confirmation sessions to ensure the fore mentioned corrective procedures were implemented.

William Aguilla, Training Manager – Assisted in the corrective training of the LCSC representatives and the creation of documentation for distribution for this re-training effort.

Michelle McRae, Subject Matter Expert - Assisted in the corrective training of the LCSC representatives and the creation of documentation for distribution for this re-training effort.

Dee Freeman Butler, General Manager – Dee Freeman-Butler initiated the first contact to all centers that this issue was identified and that corrective action was required.

Diane Myers, Ops Manager – Diane was interviewed during PwC's confirmation process of the corrective procedures/ measures being implemented. Diane confirmed the handling of orders being First In-First Out, regardless of receipt method or order type.

Elaine Hunt, Ops Manager – Elaine was interviewed during PwC's confirmation process of the corrective procedures/ measures being implemented. Elaine confirmed the handling of orders being First In-First Out, regardless of receipt method or order type.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 9 Describe the process by which PwC assured itself that BellSouth had actually resolved Issue Reference Nos. B.3, B.4, and B.5 identified in PwC's Pre-Order/Order Regionality Testing Issue Tracking matrix.

REPLY: PwC became comfortable with the implemented resolution of the above mentioned issues based on the initial communications by Dee Freeman-Butler to all LCSC that this issue had been identified and should be addressed by training. Upon the identification of this issue and reporting to the BellSouth management team, Ms. Freeman-Butler initiated this communication and PwC was emailed the details of this communication. Following this initial corrective measure, PwC was provided a copy of the flier created to address this issue in writing, along with the action plan to post these fliers in each of the representatives bays. PwC additionally observed the fliers in each bay for Atlanta and Birmingham and confirmed with several representatives and Ops Managers that the team meetings were held to address this issue.

Finally, PwC conducted follow up interviews with center staff (representatives, Ops Managers, Workload Managers and Ops Directors). In these interviews, PwC confirmed the handling of orders based on First In-First Out, regardless of order type or receipt method.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 10 Identify each BellSouth employee that PwC interviewed, the subject matter and purpose of each respective interview, and the PwC representative that conducted the interview.

REPLY: Specific details of the interviews including names of BellSouth employees and PwC interviewers and purposes of the interviews have already been provided in our working papers.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 11 Identify and describe any limitations or restrictions imposed upon PwC by BellSouth regarding the regionality evaluation of BellSouth's operational support systems.

REPLY: Outside of setting the scope of the engagement, BellSouth has imposed no restrictions or limitations upon PwC.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 12 Identify the amount of fees that PwC has received from BellSouth (and its affiliates) for professional services (including but not limited to attestations, consulting, financial audits), broken down by engagement, in the year 2000 and the year 2001 to date.

REPLY: The amount of fees received by BellSouth is deemed proprietary information. PwC can provide the information that is included in the BellSouth Proxy which is a public document. An excerpt from the BellSouth Proxy presented at the Annual Meeting of Shareholders on April 23, 2001 is as follows: (p. 13 of the Proxy):

- Audit fee for the year ending December 31, 2000
\$ 2,970,976.
- Financial Information System Design and
Implementation fees for year 2000
\$ 1,793,000.
- Other fees for services rendered by PwC for 2000
\$ 26,845,000.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

REQUEST: Tennessee Regulatory Authority

DATED: October 12, 2001

INTERROGATORY # 13 Please indicate whether PwC made any communications to BellSouth under its contractual obligation to communicate to BellSouth any illegal act, material error, or evidence that fraud may exist that came to PwC's attention. If so, please describe in detail each communication, BST's response, and the circumstance surrounding the subject of the communication.

REPLY: During the engagement PwC did not detect any illegal act, material error, or evidence that fraud may exist, thus no communication was necessary.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 1 Produce all documents, including work papers, interview/meeting notes, related to PwC's attestation dated May 3, 2001.

REPLY: These documents have already been provided to ATT. PwC wants to inform you that these documents are covered under the protective agreement between ATT and PwC as well as between BellSouth and ATT.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 2 Produce all documents, including work papers, interview/meeting notes, related to PwC's supplement report regarding BellSouth's DOE and SONGS systems.

REPLY: It is not PwC's practice to provide copies of their proprietary documents to their clients or third parties. (PwC's work papers are not delivered as part of their engagements and remain the property of PwC). However, for the convenience of the Commission and ATT, PwC will provide the Commission and ATT copy of its documents.

PwC wants to inform that these documents are covered under the protective agreement between ATT and PwC as well as between BellSouth and ATT.

An index of the document provided is attached.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Summary of Documents provided

DATED: October 12, 2001

Request	Ref.	Description
# 2	D2-01	Printout of file: "Bell South Transactions tracker master final2.xls". It's the file used to calculate the statistics for the DOE & SONGS report.
# 2	D2-02	BellSouth Regionality - Presentation in front of the FCC (August 17th).
# 2	D2-03	BellSouth Regionality - Presentation in front of the DoJ (August 17th).
# 2	D2-04	Frequently Asked Questions of PricewaterhouseCoopers Reports dated July 20, 2001 and June 21, 2000.
# 2	D2-05	Statistics provided by BellSouth.
# 3	D3-01	Emails to, from and cc BellSouth.
# 4	D4-01	Follow up email about the March 14, 2001 conference call.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore
Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 3 Produce all correspondence (e.g., electronic mail, deleted electronic mail retrievable for computer back up systems, letters, facsimiles) between PwC and BellSouth concerning PwC's review of BellSouth's OSS.

REPLY: It is not PwC's practice to provide copies of their proprietary correspondence to third parties. However, for the convenience of the Commission and ATT, PwC will provide the Commission and ATT copy of its correspondence with BellSouth.

PwC wants to inform that these documents are covered under the protective agreement between ATT and PwC as well as between BellSouth and ATT.

Please refer to the index attached at request # 2.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 4 Produce all documents, including meeting notes, related to the conference call between BellSouth and PwC on or about March 14, 2001 referenced on page 5 of the BellSouth's request for Proposal No. RFP-01-R-0017.

REPLY: It is not PwC's practice to provide copies of their proprietary documents to third parties. However, for the convenience of the Commission and ATT, PwC will provide the Commission and ATT copy of its documents, related to the conference call between BellSouth and PwC on or about March 14, 2001.

PwC wants to inform that these documents are covered under the protective agreement between ATT and PwC as well as between BellSouth and ATT.

Please refer to the index attached at request # 2.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 5 Produce all documents related to Issue Reference Nos. B.3, B.4, and B.5 in PwC's Pre-Order/Order Regionality Testing Issue Tracking matrix

REQUEST # 6 Produce all documents referenced in the PwC Comments section for Issue Reference Nos. B.3, B.4, and B.5 in PwC's Pre-Order/Order Regionality Testing Issue Tracking matrix. These documents should include, but are not limited to the process change posting in each resale work area, the "iPage" sent by Dee Freeman-Butler to all her direct reports, and the email sent to LCSC executives to LCSC staff.

REPLY: These documents are already been provided to ATT.

PwC wants to inform that these documents are covered under the protective agreement between ATT and PwC as well as between BellSouth and ATT.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 7 Produce all documents through which BellSouth disclosed to PwC regarding "all known matters contradicting the assertion and communications from regulatory agencies affecting the subject matter or assertion".

REPLY: BellSouth communicated no known matters contradicting the assertion and communications from regulatory agencies affecting the subject matter or assertion to PwC.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 8 Produce all documents related to any communications between PwC and BellSouth pursuant to its contractual obligation to report any illegal act, material error, or evidence that fraud may exist that came to PwC's attention.

REPLY: During the engagement, PwC did not detect any illegal act, material error, or evidence that fraud may exist.

BellSouth Telecommunications Inc.

State of Tennessee

Docket # 01-00362

Respondent: Robert L. Lattimore

Title: Partner PricewaterhouseCoopers

Request for Production of Documents

DATED: October 12, 2001

REQUEST # 9 Produce all documents relied upon in answering AT&T's
First Set of Interrogatories.

REPLY: All the request document relied upon in answering AT&T's
First Set of Interrogatories are already included in the
previous request of documents Nos. 1, 2, 3, 4, 5, and 6.

Steven M. Witzel
Associate General Counsel

PricewaterhouseCoopers LLP
Office of the General Counsel
1301 Avenue of the Americas
New York NY 10019-6013
Telephone (646) 394-6792
Facsimile (646) 394-6717

August 8, 2001

BY FEDERAL EXPRESS

Charles L. Becker, Esq.
Womble Carlyle Sandridge & Rice, PLLC
2100 First Union Capitol Center
150 Fayetteville Street Mall
Raleigh, NC 27602

Re: In the Matter of Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996, Docket
No. P-55, Sub 1022

Dear Mr. Becker:

Pursuant to AT&T Communications of the Southern States, Inc.'s Set of Interrogatories sent to PricewaterhouseCoopers LLP ("PwC"), effective service of which we agreed to waive in the interest of cooperation and efficiency, PwC answers as follows:

INTERROGATORY No. 1: "On page 4 [?] of the Attestation Report, references are made that there is [sic] no material differences in functionality between DOE and SONGS. List and explain all differences in functionality between the two."

Answer No. 1:

The immaterial differences PwC observed between DOE and SONGS are as follows: (i) launch and log-on procedures; (ii) commands to navigate; (iii) function keys to initiate action; and (iv) procedures for entering information, sending it to SOCS and clearing errors. PwC also directs AT&T to the documents produced in response to AT&T's Request for Production of Documents. After examination, PwC opined that BellSouth's management assertions are fairly stated in all material respects as described in our Independent Accountant's Report on Page 1.

INTERROGATORY No. 2: "On page 7 [7] of the Attestation Report, under the heading "Region-Wide Sameness of Pre-Order and Order OSS Testing, PwC discusses the "comparability" of pre-ordering and ordering OSS. Define in detail the differences between the original "sameness" review and the apparent "comparability" review.

Answer No. 2: DOE and SONGS are not "identical" in that they do not utilize one unique set of software configuration and coding; they are, however, comparable in all material respects as set forth in PwC's Attestation and work papers.

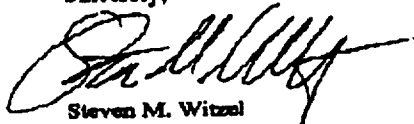
INTERROGATORY No. 3: "Did PwC interview or have any contact [sic] with representatives from competing local exchange carriers ("CLECs") in making its evaluation? If so, provide the interview questions, responses, or details of other contacts and explain what part of the evaluation was affected."

Answer No. 3: No.

INTERROGATORY No. 4: "On page 10 of the Attestation, PwC states that a selection of pre-ordering and ordering transactions were made to verify those versions of OSS. Please explain what transactions were selected and explain in detail how the verification was made."

Answer No. 4: The affidavit of Robert Lattimore (dated May 21, 2001) and Attachment B thereto, sets forth in the detail the circumstances and nature of the automated transactions traced by PwC.

Sincerely,



Steven M. Witzel

Cc: Lisa Foahoe, Esq.

(2)

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

James P. Lamoureux
AT&T
1200 Peachtree St., NE, #4068
Atlanta, GA 30367

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219

Terry Monroe
Competitive Telecom Assoc.
1900 M St., NW, #800
Washington, DC 20036

